

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

GAIL CORVELLO, et al.,)	
Plaintiffs,)	C.A. No. 05-0221S
)	(Related Case Nos.: 05-522S,
v.)	05-274S, 05-370S)
)	
NEW ENGLAND GAS COMPANY;)	
SOUTHERN UNION COMPANY)	
Defendant and)	
Third-Party Plaintiff,)	
)	
v.)	
)	
BRIDGESTONE AMERICAS TIRE)	
OPERATIONS, LLC and)	
HONEYWELL INTERNATIONAL INC.)	
Third-Party Defendants.)	

SIXTH¹ JOINT MOTION TO CONTINUE HEARING DATE
ON THE SIMPSON FAMILY TRUST’S MOTION TO QUASH

Non-Party the Simpson Family Trust (the “Trust”) and Third-Party Plaintiff Southern Union Company/New England Gas Company (collectively, “Southern Union”) respectfully submit this joint request that the Court continue the hearing on the Trust’s Motion to Quash the Subpoena of Southern Union, presently scheduled for Wednesday, November 28, 2012, for an additional thirty (30) days because a still anticipated settlement between Southern Union and the Third-Party Defendants will obviate the need for the subpoena to inspect and sample the area at issue in the Trust’s Motion.

¹ The initial Joint Motion to Continue Hearing was filed on May 25, 2012 (Doc. 1006), and granted by text order entered later that day. The Second Joint Motion to Continue Hearing Date was filed on June 20, 2012 (Doc. 1007) and granted by text order entered later that day. The Third Joint Motion to Continue Hearing Date was filed on July 23, 2012 (Doc. 1008) and granted by text order entered the following day. The Fourth Joint Motion to Continue Hearing Date was filed on August 27, 2012 (Doc. 1010) and granted by text order entered the following day. The Fifth Joint Motion to Continue Hearing Date was filed on October 10, 2012 (Doc 1011) and granted by text order entered the following day.

As noted in the parties' prior Joint Motions to Continue Hearing Date, Southern Union and Bridgestone engaged in mediation and reached a settlement in principle. Similarly, Southern Union and Honeywell engaged in mediation and, like with Bridgestone, are in the process of preparing and finalizing settlement and related court documents. While those documents are presently in the process of being finalized, it is unlikely that the settlements will be completed prior to the hearing presently scheduled for November 28, 2012.

Because the anticipated settlements will not be finalized before the November 28, 2012 hearing, and because the settlements will render moot Southern Union's subpoena to the Trust, as well as the Trust's Motion to Quash, the Trust and Southern Union respectfully request that this Court continue the hearing on the Trust's motion for thirty (30) days.

Respectfully submitted,

SOUTHERN UNION COMPANY AND
NEW ENGLAND GAS COMPANY
By its Attorneys,

/s/ Robin L. Main

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Dated: November 26th, 2012

CERTIFICATE OF SERVICE

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I hereby certify that on the 26th day of November, 2012, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Robin L. Main

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